

Dear FCC,

*Regarding the Notice of Rulemaking in Docket RM-10787, Petition to stop morse code testing requirements, I am hereby against any more relaxing of the morse code testing requirement to operate on 30Mhz and below. The amateur hf bands are still used extensively by many CW operators in the low 50Khz of each band. Most of this operation is in the low 25Khz of each band especially for DX operation where one may not know the verbal language of the DX station being worked, thus CW is the only way to work the distant station reliably.

*These requirements were already amended on 12/30/1999 where the FCC simplified the licensing system outlined in Part 97 of the rules effectively reducing the number of license classes from 6 to 3, and at the same time eliminated the 13wpm and the 20wpm morse code testing requirements leaving only the 5wpm (entry level Novice) requirement for the remaining higher class licenses.

*I feel that these bands are still used by proficient operators and the introduction of un-skilled operators into these frequencies would damage the capability of the former mentioned operators to reliably communicate with foreign countries. As a licensed amateur radio operator who uses these bands daily, I know that if you remove the existing CW testing requirements, it will only introduce havoc on the lower 25Khz of each HF band effectively killing any reliable DX operation. For many years the CW portions of all the HF bands have been controlled more or less by gentlemen's agreement as far as QRLing a frequency, and using "Q" signals in general. An unskilled CW operator does not belong in the lower 25Khz segments until they become skilled in the proper use of these "Q" signals and or proper etiquette in general. This is one thing that differentiates us from the CB band. The 5wpm test is adequate for an "entry level" license to be used on frequencies other than the low 25Khz in each HF band, and of course 6 and 2 meters for the purpose of practicing to become more proficient in CW operation, and as a prerequisite to obtaining a higher license. To remove this structure would spell the doom of etiquette on the CW bands as we know it today. To remove the discipline would turn it into ugliness. Anyone can plug in a laptop computer and communicate through a modem on the air, but what skill does that take? And when the computer dies you are off the air.

*Morse code is still used on a daily basis, and anyone who says differently is ill educated in this art. Just turn on any hf receiver at any time of day on the 5 main amateur bands - (80,40,20,15,10meters), these of course not even including the WARC bands which are also very much CW (30Meters is ONLY CW) and listen around the bottom 50Khz of any band and you WILL hear many CW stations communicating. These stations are being operated by not only the "old timers", but there are many young operators also. So morse code is not going away by any means as a reliable mode of communication on the amateur bands. But I agree that CW is only a "mode" among many to communicate on the HF bands, and a darn reliable one too. It is so reliable

that all my microphones are hidden away collecting dust. The truth is that the dawn of ham radio was CW and it lives today even though it may be obsolete, because of it's reliability.

*Morse code is still used in many commercial radio bands as identifiers as the FAA, Police, Fire, Amateur, Military etc.. Communication systems use morse code to identify their systems on the air, such as aviation VOR beacon stations or even a local police or fire repeater auto identifying itself.

*Morse code is still the backup mode (when everything else fails) to communicate during an emergency. Just think how bad it would be if a boat that was lost at sea and the microphone got wet or damaged but no one knew morse code anymore, that would truly be a shame as the "mayday" or the "sos" could still be sent by the ships ptt switch or even a couple of wires touching together. Aircraft can send morse code in a distress situation by turning the lights on and off, only as a last resort but if there were no more proficient morse code operators, it would be for not. We must keep trained CW operators on the bands - period. You never know when you may receive a mayday or sos even though it is an old technology, it works when nothing else does. You are not going to fire up a laptop computer and wait for it to boot windows 2000 when the ship is sinking or the plane is falling and your microphone is broken.

*I hereby state as a licensed amateur radio operator (callsign W2CO) and a commercially licensed (GROL PG-GB-029372) with ship radar endorsement, am against any further rule changes to Part 97 regarding morse code testing requirements to obtain a higher class amateur license. The existing 5wpm requirement for the higher class licenses is already easy enough to get, and 5wpm was intended to be a NOVICE level CW license to be able to practice on the bands and improve ones skill level until upgrading to the higher classes of licenses, and joining the more proficient operators in the low 25khz of the bands. If any changes are to be made to said rules, they should stay out of the lower 25Khz of each band until they are more proficient. No other mode except for CW should ever be used in the lower 25khz of each HF band. I further say that I believe the Extra class should pass a higher speed CW test as they ARE allowed below .025 on the HF bands. This existing "5wpm Extra Lite" class of license is completely contradictory to the roots of amateur radio, unless they stay clear of the lower 25khz portions of the HF bands. Perhaps we should create a new version of the Extra Class license - lets call it "Extra Heavy" for the ones that have passed the 20wpm test. Now we would have "Extra Lites" and "Extra Heavies".

Sincerely,

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Ship Radar

